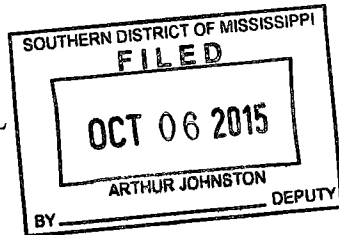


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

GERALDSON JEAN-PAUL



CRIMINAL NO. *3:15cr184 TSL-FKB*

18 U.S.C. § 641

18 U.S.C. § 1028(a)(7)

18 U.S.C. § 1028A

**The Grand Jury Charges:**

At all times relevant to this indictment:

1. The Social Security Act of 1935 initiated the unemployment insurance ("UI") system. The UI system is designed to provide benefits to persons out of work due to no fault of their own, and is administered for the Federal Government by the state employment offices. In Mississippi, the agency responsible for program oversight is the Mississippi Department of Employment Security ("MDES") on behalf of the United States Department of Labor. The United States Department of Labor ("DOL") funds all substantive and administrative costs for MDES.

2. U.S. Bank was a financial institution, the accounts and deposits of which were Federally insured. Bancorp Bank was a financial institution, the accounts and deposits of which were Federally insured.

3. MDES is located in Hinds County in the Northern Division of the Southern District of Mississippi.

## COUNT 1

4. That from in or about July 2014, and continuing until in or about March of 2015, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **GERALDSON JEAN-PAUL**, did steal, purloin, and knowingly convert to his own use, or the use of another, greater than \$1,000.00 in funds of the United States of America.

In violation of Sections 641 and 2, Title 18, United States Code.

## COUNTS 2-10

5. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **GERALDSON JEAN-PAUL**, knowingly used without lawful authority a means of identification of another person, i.e., their name and social security number, with the intent thereby to fraudulently obtain UI benefits from MDES, by submitting a false claim for unemployment benefits with the MDES, which caused MDES to transfer the funds to various accounts controlled by the defendant at various financial institutions for the purpose of withdrawing the funds from automated teller machines located outside the state of Mississippi.

COUNT	VICTIM	AMOUNT	DATE OF CLAIM
2	B.W.	\$223.00	8/28/2014
3	H.L.	\$403.00	9/25/2014
4	J.C.	\$403.00	9/26/2014
5	L.V.	\$323.00	9/25/2014
6	D.B.	\$203.00	8/27/2014
7	T.W.	\$403.00	9/26/2014
8	R.R	\$603.00	9/23/2014

9	R.W.	\$603.00	10/02/2014
10	C.S.	\$503.00	9/23/2014

All in violation of Sections 1028(a)(7) and 2, Title 18, United States Code.

#### COUNTS 11-19

6. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **GERALDSON JEAN-PAUL**, knowingly used without lawful authority a means of identification of another person, i.e., their name and social security number, with the intent thereby to fraudulently obtain UI benefits from MDES, by submitting a false claim for unemployment benefits with the MDES, which caused MDES to transfer the funds to various accounts controlled by the defendant at various financial institutions for the purpose of withdrawing the funds from automated teller machines located outside the state of Mississippi, during and in relation to a violation of Section 1343, Title 18, United States Code, to wit, wire fraud.

COUNT	VICTIM	AMOUNT	DATE OF CLAIM
11	B.W.	\$223.00	8/28/2014
12	H.L.	\$403.00	9/25/2014
13	J.C.	\$403.00	9/26/2014
14	L.V.	\$323.00	9/25/2014
15	D.B.	\$203.00	8/27/2014
16	T.W.	\$403.00	9/26/2014
17	R.R	\$603.00	9/23/2014
18	R.W.	\$603.00	10/02/2014
19	C.S.	\$503.00	9/23/2014

All in violation of Sections 1028A and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

7. As a result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 982(a)(2)(B) & 1028(b), Title 18, United States Code.

  
GREGORY K. DAVIS  
United States Attorney

A TRUE BILL:

S/SIGNATURE REDACTED

Foreperson of the Grand Jury

Foreperson of the Grand Jury

S/SIGNATURE REDACTED

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 6<sup>th</sup> day of October, 2015.

  
UNITED STATES MAGISTRATE JUDGE